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10 *Attorneys for Plaintiff, HSBC Bank USA, National Association, as Trustee for Mortgage Pass-*
11 *Through Certificates, MLMI Series 2006-A4*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 HSBC BANK USA, NATIONAL
11 ASSOCIATION, AS TRUSTEE FOR
12 MORTGAGE PASS-THROUGH
13 CERTIFICATES, MLMI SERIES 2006-A4,

14 Plaintiff,

15 vs.

16 FIDELITY NATIONAL TITLE GROUP, INC.;
17 CHICAGO TITLE INSURANCE COMPANY;
18 CHICAGO TITLE AGENCY OF NEVADA;
19 DOE INDIVIDUALS I through X; and ROE
20 CORPORATIONS XI through XX, inclusive,

21 Defendants.

Case No.: 2:21-cv-00195-RFB-DJA

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO
RESPOND TO MOTIONS TO DISMISS
[ECF Nos. 11-13]**

[First Request]

22 Plaintiff, HSBC Bank USA, National Association, as Trustee for Mortgage Pass-
23 Through Certificates, MLMI Series 2006-A4 (“HSBC Bank Trustee”), Specially-Appearing
24 Defendant Fidelity National Title Group, Inc., and Defendants Chicago Title Insurance
25 Company and Chicago Title Agency of Nevada (“Defendants”, collectively, the “Parties”), by
26 and through their counsel of record, hereby stipulate and agree as follows:

- 27 1. On February 3, 2021, HSBC Bank Trustee filed its Complaint in Eighth Judicial District
28 Court, Case No. A-21-828889-C [ECF No. 1-1].
2. On February 3, 2021, Chicago Title Insurance Company filed its Petition for Removal to
this Court [ECF No. 1].

- 1 3. On March 8, 2021, Chicago Title Insurance Company, Chicago Title of Nevada, Inc.,
2 and Fidelity National Title Group, Inc. each filed a Motion to Dismiss [ECF No. 11-13].
3 4. HSBC Bank Trustee's deadline to respond to Defendants' Motions to Dismiss is
4 currently March 22, 2021.
5 5. HSBC Bank Trustee's counsel is requesting an extension until April 22, 2021, to file its
6 response to the pending Motions to Dismiss.
7 6. This extension is requested to allow HSBC Bank Trustee additional time to review and
8 respond to the points and authorities cited to in the pending Motions.
9 7. Counsel for Defendants does not oppose the requested extension;
10 8. This is the first request for an extension which is made in good faith and not for
11 purposes of delay.

12 **IT IS SO STIPULATED.**

13 DATED this 22nd day of March, 2021.

DATED this 22nd day of March, 2021.

14 WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN LLP

16 /s/ Lindsay D. Robbins

/s/ Kevin Sinclair, Esq.

17 Lindsay D. Robbins, Esq.

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21 *Attorneys for Plaintiff, HSBC Bank USA,*

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National Association, as Trustee for

Title Group, Inc., Chicago Title Insurance

Mortgage Pass-Through Certificates, MLMI

Company, and Chicago Title Agency of

Series 2006-A4

Nevada

22 **IT IS SO ORDERED.**

23 Dated this 22nd day of March, 2021.

24
25 
26 **RICHARD E. BOULWARE, II**
27 **United States District Court**
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